

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

UNITED STATES OF AMERICA )  
 ) No. 3:22-cr-00327  
v. )  
 )  
 )  
 )  
CHESTER GALLAGHER, et al. )

**PARTIAL JOINT NOTICE OF FILING OF PROPOSED JURY QUESTIONNAIRE**

The United States of America, by and through its counsel of record, and defendants, by and through their counsel of record, respectfully files the attached Joint Proposed Jury Questionnaire. Please note, two of the questions are not joint, and those defendants opposing the questions are noted in footnotes. The parties respectfully request that the Court provide copies of the completed questionnaires to the parties on or before January 12, 2024, to enable the parties to be prepared at the start of trial on January 16, 2024.

The parties anticipate that individual voir dire may be necessary for several potential jurors. The parties propose that, after review of the questionnaires, the parties identify potential jurors for whom they would want to conduct individual voir dire, and the Court call those potential jurors into the courtroom one at a time for voir dire. This will avoid the need to conduct voir dire at the bench and may expedite the jury selection process.

Respectfully submitted,

HENRY C. LEVENTIS  
United States Attorney for the  
Middle District of Tennessee

s/ *Amanda J. Klopf*

AMANDA J. KLOPF  
Assistant United States Attorney  
791 Church St, Suite 3300  
Nashville, Tennessee 37203  
Phone: 615-736-5151

KRISTEN M. CLARKE  
ASSISTANT ATTORNEY GENERAL  
s/ Kyle Boynton  
KYLE BOYNTON  
Trial Attorney  
Civil Rights Division, Criminal Section  
U.S. Department of Justice  
950 Pennsylvania Ave. NW  
Washington, DC 20530  
Phone: 202-598-0449  
Kyle.Boynton@usdoj.gov

s/ Wilfred T. Beaye  
Wilfred T. Beaye, Jr.  
Trial Attorney  
Civil Rights Division, Criminal Section  
U.S. Department of Justice  
950 Pennsylvania Ave. NW  
Washington, DC 20530  
Phone: 771-3333-1681  
Wilfred.Beaye@usdoj.gov

/s/ with authorization

**JODIE A. BELL**

Law Office of Jodie A. Bell  
Washington Square Building 214 Second  
Avenue North Suite 208  
Nashville, TN 37201  
USA  
jodie@attorneyjodiebell.com  
(615) 953-4977

*Attorney for Defendant Chester Gallagher*

/s/ with authorization

**WILLIAM J. CONWAY**

William J. Conway, Esq. P.C.  
214 Second Avenue North, Suite 208  
Nashville, TN 37201  
(615) 260-5364  
wjconway@gmail.com

*Attorney for Defendant Heather Idoni*

/s/ with authorization

**LARRY LAMONT CRAIN**  
5214 Maryland Way  
Suite 402  
Brentwood, TN 37207  
(615) 376-2600  
larry@crainlaw.legal

**STEPHEN M. CRAMPTON**

Thomas More Society  
P.O. Box 4506  
Tupelo, MS 38803  
662-255-9439  
scrampton@thomasmoresociety.org  
*Attorneys for Defendant Paul Vaughn*

/s/ with authorization

**ROBERT LYNN PARRIS**  
208 3rd Avenue North Ste 300  
Nashville, TN 37201  
rlp@robertparrisattorney.com  
(901) 490-8026

*Attorney for Defendant Calvin Zastrow*

/s/ with authorization

**G. KERRY HAYMAKER**

Haymaker & Heroux, P.C.  
545 Mainstream Drive  
Suite 420  
Nashville, TN 37228  
(615) 250-0050  
haymaker@tennesseedefense.com

**STEVE C. THORNTON, I**

Steve Thornton Attorney Law Office  
P.O. Box 16465  
Jackson, MS 39236  
mail@lawlives.com  
(601) 982-0313

*Attorneys for Defendant Coleman Boyd*

/s/ with authorization

**MANUEL B. RUSS**  
340 21st Avenue North  
Nashville, TN 37203  
(615) 329-1919  
russben@gmail.com

**JOHN R. MANSON**

3112 Carrington Court  
Nashville, TN 37218  
USA  
jmanson@lewisthomason.com  
615-259-1366

*Attorneys for Defendant Dennis Green*

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing Notice was electronically filed with the Clerk on December 18, 2023, and service was made upon all persons registered in that case via CM/ECF and/or by email.

*/s/Amanda Klopf*  
AMANDA KLOPF  
Assistant United States Attorney